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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

Chapter 11

GENERAL MOTORS CORP., *et al.*

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

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**OBJECTION OF BRANDENBURG INDUSTRIAL SERVICE CO. TO
NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND ASSIGN
CERTAIN EXECUTORY CONTRACTS, UNEXPIRED LEASES OF
PERSONAL PROPERTY, AND UNEXPIRED LEASES OF NONRESIDENTIAL
REAL PROPERTY AND (II) CURE AMOUNTS RELATED THERETO**

Brandenburg Industrial Service Co. ("Brandenburg"), by its undersigned attorneys and pursuant to Bankruptcy Code Section 365(b), submits this objection to the Notice of Debtors' Intent To Assume And Assign Certain Executory Contracts And Cure Amounts Related Thereto (the "Assumption Notice") and states:

1. Brandenburg is party to contracts with one or more of the above-captioned Debtors pursuant to which Brandenburg performs construction-related services.

2. On June 1, 2009, Debtors filed petitions for bankruptcy under Chapter 11.

3. On or about June 5, 2009, Debtors filed and served the Assumption Notice. The Assumption Notice refers to a website containing information about assumable executory contracts and their corresponding cure amounts.

4. The website lists two Brandenburg contracts, in pertinent part below:

<u>Row ID</u>	<u>GM Contract ID</u>	<u>Vendor ID</u>	<u>Counterparty</u>
5716-00035107	GMS26145	177881687	Brandenburg
5716-00107721	GMS29750	177881687	Brandenburg

5. The website further provides that, for contract identification number GMS26145, the proposed cure amount is \$21,713.54. Brandenburg has no objection to this cure amount.

6. However, Brandenburg objects to the Assumption Notice because Debtors have not provided a proposed cure amount for contract identification number GMS29750. The default amount under that contract, which Brandenburg currently is owed, is \$972,649.03. That amount is comprised of the following charges under the contract:

Original contract remaining:	\$482,235.10
Retention:	\$147, 431.13
Unreconciled field order nos. 1-5:	\$342,982.80

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WHEREFORE, Brandenburg Industrial Service Co. prays that this Court enter an order (a) denying assumption and assignment of Brandenburg's contracts; (b) conditioning any assumption and assignment of Brandenburg's contracts upon Debtors' immediate payments of \$972,649.03 and \$21,713.54 to Brandenburg, and (c) providing such other relief as this Court deems just and proper.

Dated: New York, New York
June 12, 2009

HALPERIN BATTAGLIA RAICHT, LLP

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